U.S. Serial No.: 10/642,311

Group Art Unit: 2854 Examiner: Jill E. Cull

Page 19 of 22

<u>REMARKS</u>

Claims 4-14 and 16-17 are pending in the present application. Claims 1, 2, 3

and 15 have been cancelled herein. Claims 16 and 17 have been added herein.

I. FORMAL MATTERS

A. Allowed Claims

Applicant notes with appreciation the Examiner's indication that claims 4-12

would be allowable if rewritten to overcome the minor noted informalities, and claims

13 and 14 would be allowable if rewritten in independent form. Applicant has

rewritten claims 13 and 14 in independent form herein. Therefore, Applicant submits

that claims 13 and 14 are now allowable. New claims 16 and 17 include many of the

features of allowed claims 4 and 12, respectively. Therefore, Applicant submits that

new claims 16 and 17 are also allowable.

B. Formal Drawings

Applicant notes with appreciation the Examiner's indication that the formal

drawings filed on August 14, 2003 are acceptable.

C. Information Disclosure Statements

U.S. Serial No.: 10/642,311

Group Art Unit: 2854 Examiner: Jill E. Cull

Page 20 of 22

Applicant notes with appreciation the Examiner's inclusion in the Office Action

a copy of the PTO Form 1449's that were submitted in the Information Disclosure

Statements filed on August 14, 2003 and January 9, 2004. Each of the references

listed therein is initialed by the Examiner, thereby indicating that these references

were considered by the Examiner.

D. Priority Documents

Applicant notes with appreciation the Examiner's acknowledgement of claim to

priority and indication that certified copies of the priority documents were received.

II. OBJECTIONS TO THE SPECIFICATION AND CLAIMS

The Examiner has made several objections to the claims. Except as noted

below, Applicant submits that the above amendments to the claims overcome the

noted objections. Regarding the objection to claim 7, lines 3 and 8, Applicant submits

that the term "release lever sub" is appropriate because patentees are free to be their

own lexicographers, and that this term is defined clearly in paragraphs 83 and 84 on

pages 27-28 of the specification.

The Examiner objects to several portions of the disclosure. Applicant submits

that the above amendments to the specification overcome the noted objections.

U.S. Serial No.: 10/642,311

Group Art Unit: 2854 Examiner: Jill E. Cull

Page 21 of 22

The Examiner rejects claim 15 under 35 U.S.C. § 112, second paragraph.

Claim 15 has been cancelled herein. Therefore, this rejection is now moot.

III. PRIOR ART REJECTION

Claims 1-3 and 15 are rejected under 35 U.S.C. § 103(a) as being unpatentable

over U.S. Patent No. 6,619,796 (Rasmussen) in view of European Patent No. 620,118

(Yasuoka). Claims 1-3 and 15 have been cancelled herein. Therefore, Applicant

submits this rejection is now moot.

Accordingly, Applicant submits that the present application is now in condition

for allowance. If the Examiner believes that any outstanding issues can be resolved

through a telephone interview, Applicant respectfully requests the Examiner to contact

the undersigned at the telephone number provided below.

U.S. Serial No.: 10/642,311

Group Art Unit: 2854 Examiner: Jill E. Cull

Page 22 of 22

Applicant believes that no additional fees are due for the subject application.

However, if for any reason a fee is required, a fee paid is inadequate or credit is owed for any excess fee paid, you are hereby authorized and requested to charge Deposit Account No. **04-1105**.

Respectfully submitted,

Date: September 16, 2004

Customer No.: 21874

John J. Penny, dr. Reg. No. 36,984

Intellectual Property Practice Group of

EDWARDS & ANGELL, LLP

P. O. Box 55874 Boston, MA 02205

Tel: (617) 517-5549 Fax: (617) 439-4170

BOS2_458500